

LITE DEPALMA GREENBERG, LLC

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*Attorneys for Defendants Rambaxy Pharmaceuticals, Inc.,
Rambaxy Laboratories, Ltd., Rambaxy Laboratories, Inc.,
Rambaxy, Inc. and Rambaxy USA*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Francis Fenwick, et al. and Edward Safran, Individually and on behalf of all others similarly situated	:	
	:	Civil Action No. 12-7354 (PGS)(DEA)
Plaintiffs	:	
vs.	:	
Rambaxy Pharmaceuticals, Inc., Rambaxy Laboratories, Ltd., Rambaxy Laboratories, Inc., Rambaxy, Inc., Rambaxy USA, Daiichi Sankyo Company Ltd., Ohm Laboratories, Express Scripts Inc., Express Scripts Holding Company, Medco Health Solutions, Inc., ABC Corporations 1-10, and John Does 1-10,	:	CERTIFICATION OF MATTHEW F. DEXTER, ESQ. IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE
Defendants.	:	
	:	

MATTHEW F. DEXTER, of full age, hereby certifies as follows:

1. I am a partner with the firm of Kirkland & Ellis LLP, located at 601 Lexington Avenue, New York, New York 10022, co-counsel for Defendants Rambaxy Pharmaceuticals, Inc., Rambaxy Laboratories, Ltd., Rambaxy Laboratories, Inc., Rambaxy, Inc. and Rambaxy USA

("Ranbaxy") in the captioned matter. I make this certification on my personal knowledge in support of Ranbaxy's application to have me admitted *pro hac vice*.

2. I am a member in good standing of the bars of the State of New York (admitted in 2005); the United States District Court for the Southern District of New York (admitted in 2006); and the United States District Court for the District of Colorado (admitted in 2007). The names and addresses of the offices maintaining the rolls of members of the bars in those jurisdictions are as follows:

New York

Attorney Records Clerk
Appellate Division, First Judicial Dept.
41 Madison Avenue, 26th Floor
New York, NY 10010

**United States District Court for the
Southern District of New York**

Clerk of Court
Daniel Patrick Moynihan
U.S. Courthouse
500 Pearl Street
New York, NY 10007

**United States District Court for the
District of Colorado**

Alfred A. Arraj United States
Courthouse
901 19th Street
Denver, CO 80294-3589

3. I am not under suspension, nor have I ever been suspended or disbarred from any court. I am fully familiar with the facts of this case.

4. I am fully conversant with the Local Civil Rules of the United States District Court for the District of New Jersey, and will abide by those Rules.

5. Upon entry of the requested order, a check in the appropriate amount will be forwarded to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a).

6. In accordance with Local Civil Rule 101.1(c)(3), upon entry of the request order, a check in the amount of \$150.00 will be forwarded to the Clerk, United States District Court.

7. I understand that in accordance with Local Civil Rule 101.1(c)(5), a lawyer admitted *pro hac vice* is within the disciplinary jurisdiction of this Court. I agree to comply with the requirements of Local Civil Rule 101.1(c). I agree to take no fee in any tort case in excess of New Jersey Court Rule 1:21-7 governing contingent fees.

8. The firm of Lite DePalma Greenberg, LLC of Newark, New Jersey has agreed to work with my firm in the defense of this action.

9. I respectfully request that this Court grant Ranbaxy's application to have me admitted *pro hac vice* for all purposes in this matter, including the trial of this case. I understand that Counsel for Plaintiffs have no objection to my admission.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false I am subject to punishment.



MATTHEW F. DEXTER

Dated: February 12, 2013